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Attorneys for Defendant,

**NISSAN NORTH AMERICA, INC.**

**UNITED STATES DISTRICT COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

DYNYKEA D. MURRAY, an individual,

Plaintiff,

vs.

NISSAN NORTH AMERICA, INC., et  
al.,

Defendants.

Case No: 5:22-cv-01907-MRW

Judge: Michael R. Wilner

**JOINT NOTICE OF SETTLEMENT**

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEY OF RECORD:**

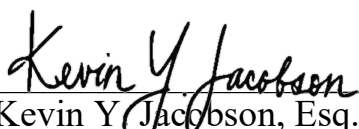
2 **PLEASE TAKE NOTICE** that Plaintiff, DYNYKEA D. MURRAY, and  
3 Defendant, NISSAN NORTH AMERICA, INC., (the “Parties”), jointly, write to advise  
4 this Court that they have settled this matter; however, the attorneys’ fees, costs, and  
5 expenses remain outstanding, and Plaintiff intends to file a noticed motion. The Parties  
6 request that the Court vacate any upcoming hearings and deadlines while the  
7 performance of the settlement terms is pending.

8 Once all terms of the settlement are completed and payment is received by  
9 Plaintiff and after payment of Plaintiff’s attorneys’ fees, costs and expenses, to be  
10 determined by agreement of the Parties or by noticed motion, the Parties shall file an  
11 executed Stipulation of Dismissal of the entire action with prejudice. The Parties expect  
12 to file the dismissal papers within 90 to 120 days.

13 Based on the foregoing, the Parties respectfully request that the Court Order that  
14 this action be dismissed without prejudice and the Court continue to retain jurisdiction  
15 over this action to enforce the terms of the settlement agreement.

16  
17 Dated: March 22, 2024,

QUILL & ARROW LLP

18  
19 By   
20 Kevin Y. Jacobson, Esq.  
21 Allen Amarkarian, Esq.  
22 Attorneys for Plaintiff,  
23 DYNYKEA D. MURRAY

24  
25 Dated: March 22, 2024,

SHOOK, HARDY & BACON L.L.P.

26 By: /s/ Jennifer M. Stevenson  
27 Amir Nassihi, Esq.  
28 Jennifer M. Stevenson, Esq.  
Attorneys for Defendant  
NISSAN NORTH AMERICA, INC.